

Exhibit 6

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 -----

5 Civil Action No.
6 In re: FLINT WATER CASES 5:16-cv-10444

7

8 HON. JUDITH E. LEVY
9 MAG. MONA K. MAJZOUB

10 -----

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12 STATE OF MICHIGAN
13 IN THE CIRCUIT COURT FOR THE COUNTY OF GENESEE

14 -----

15 IN RE FLINT WATER Case No. 17-108646-NO
16 LITIGATION Hon. Richard B. Yuille

17

18 -----

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20 JENNIFER MASON, et al. Case No. 16-106150-NM
21 Hon. Richard B. Yuille

22 Plaintiffs,

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24 V.

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26 LOCKWOOD, ANDREWS & NEWNAM,
27 PC, et al.,

28

29 Defendants. HIGHLY CONFIDENTIAL

30 -----X VOLUME I

31

32 VIDEOTAPED DEPOSITION OF DAVID GADIS

33

34 Thursday, January 30, 2020, 9:07 a.m.

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36 Washington, DC 20005

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38 Reported by: Denise Dobner Vickery, RMR, CRR

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40 GOLKOW LITIGATION SERVICES

41

42 T 877.370.3377 | F 917.591.5672

43

44 deps@golkow.com

1

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Thursday, January 30, 2020

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9:07 a.m.

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10 Videotaped Deposition of DAVID GADIS,
11 held at the offices of:

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COHEN MILSTEIN SELLERS & TOLL PLLC

14

1100 New York Avenue NW

15

Suite 500, West Tower

16

Washington, DC 20005

17

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20 Pursuant to notice, before Denise Dobner
21 Vickery, Certified Realtime Reporter, Registered
22 Merit Reporter, and Notary Public in and for the
23 District of Columbia.

24

1 APPEARANCES:

2

3 ON BEHALF OF EXECUTIVE COMMITTEE FOR CLASS
4 PLAINTIFFS:

5

EMMY L. LEVENS, ESQ.
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue NW, Fifth Floor
Washington, DC 20005
elevens@cohenmilstein.com
202.408.4600

8

9 ON BEHALF OF PLAINTIFFS CHOLYANDA BROWN AND CARL
10 ROGERS II (via teleconference):

11

DONALD H. DAWSON, JR., ESQ.
FIEGER LAW
19390 West Ten Mile Road
Southfield, MI 48075
d.dawson@fiegerlaw.com
248.355.5555

14

15 ON BEHALF OF MASON STATE COURT CLASS AS LIAISON
16 COUNSEL:

17

JAYSON E. BLAKE, ESQ.
MCALPINE PC
3201 University Drive, Suite 200
Auburn Hills, MI 48326
jeblake@mc Alpinepc.com
248.373.3700

20

21

22

23

24

1 APPEARANCES: (Continued)

2

3 ON BEHALF OF THE PEOPLE OF THE STATE OF MICHIGAN:

4 NATHAN GAMBILL, ESQ.

Assistant Attorney General

5 STATE OF MICHIGAN

DANA NESSEL, ATTORNEY GENERAL

6 Environment, Natural Resources,

and Agriculture Division

7 6th Floor G. Mennen Williams Building

525 West Ottawa Street

8 Lansing, MI 48909

gambilln@michigan.gov

9 517.335.7664

10

11 ON BEHALF OF THE WITNESS:

12 MICHAEL A. BROWN, ESQ.

YODESKI Y. ACQUIE, ESQ.

13 NELSON MULLINS RILEY & SCARBOROUGH, LLP

100 S. Charles Street, Suite 1600

14 Baltimore, MD 21201

Mike.brown@nelsonmullins.com

15 Yodeski.acquie@nelsonmullins.com

443.392.9401

16

17

ON BEHALF OF DEFENDANTS VEOLIA WATER NORTH

18 AMERICA OPERATING SERVICES, LLC, VEOLIA NORTH

AMERICA, LLC, VEOLIA NORTH AMERICA, INC.:

19

BRYAN D. McELVAINE, ESQ.

20 KRISTIN DUPRE, ESQ.

CAMPBELL CONROY & O'NEIL PC

21 1205 Westlakes Drive, Suite 330

Berwyn, PA 19312

22 bmcelvaine@campbell-trial-lawyers.com

kdupre@campbell-trial-lawyers.com

23 610.964.6381

24

1 APPEARANCES: (Continued)

2

3 ON BEHALF OF DEFENDANT CITY OF FLINT
(via teleconference):

4

SHELDON H. KLEIN, ESQ.

5

BUTZEL LONG

41000 Woodward Avenue

6

Bloomfield Hills, MI 48304

kleins@butzel.com

7

248.258.1616

8

9 ON BEHALF OF DEFENDANTS LEO A. DALY COMPANY AND
LOCKWOOD, ANDREWS & NEWNAM, INC.

10 (via teleconference):

11

JUDE T. HICKLAND, ESQ.

FAEGRE DRINKER BIDDLE & REATH LLP

12

1717 Main Street, Suite 5400

Dallas, TX 75201-7367

13

jude.hickland@faegredrinker.com

469.357.2535

14

15

ON BEHALF OF DEFENDANTS MDEQ EXECUTIVE DEFENDANTS

16 (via teleconference):

17

THADDEUS E. MORGAN, ESQ.

FRASER TREBILCOCK

18

124 W. Allegan Street

Suite 1000

19

Lansing, MI 48933

tmorgan@fraserlawfirm.com

20

517.377.0877

21

22

23

24

1 APPEARANCES: (Continued)

2

3 ON BEHALF OF DEFENDANT ADAM ROSENTHAL
4 (via teleconference):

5

6 JAMES A. FAJEN, ESQ.
7 FAGEN & MILLER, PLLC
8 3646 West Liberty Road
9 Ann Arbor, MI 48103
10 fajenlaw@fajenmiller.com
11 734.995.0181
12

13

14 ON BEHALF OF DEFENDANT DARNELL EARLEY
15 (via teleconference):

16

17 JOSEPH R. FURTON, JR., ESQ.
18 THE FURTON LAW FIRM
19 290 Town Center Drive, Suite 420L
20 Dearborn, MI 48126
21 jfurton@furtonlaw.com
22 313.574.4794
23

24

25 ON BEHALF OF DEFENDANT MCLAREN REGIONAL MEDICAL
26 CENTER (via teleconference):

27

28 MEGAN R. MULDER, ESQ.
29 CLINE, CLINE & GRIFFIN, PC
30 Mott Foundation Building
31 503 S. Saginaw Street, Suite 1000
32 Flint, MI 48502
33 mmulder@ccglawyers.com
34 800.837.1973
35

36

37 ALSO PRESENT:

38 FRANCIS X. FERRARA,
39 Senior VP & Deputy General Counsel
40 Veolia North America

41 VIDEOGRAPHER: Daniel Holmstock

1 not necessarily always the -- the facts in selling
2 in selling -- in selling your brand.

3 Q. I understand that, sir.

4 Would you agree that as someone in
5 charge of business development, though, a central
6 component of that is making money for the company;
7 correct?

8 A. Depends on what the goals are for
9 that year.

10 Q. Can you identify a single year after
11 you took over business development in which the
12 goals were not related to making money for Veolia?

13 MR. BROWN: Objection. Misstates
14 his testimony.

15 MS. LEVENS: Can you name a year?
16 I'm not quoting his testimony.

17 THE WITNESS: I don't know about a
18 year, but there are different projects that
19 don't necessarily mean that you make money.

20 BY MS. LEVENS:

21 Q. And what would those goals have been
22 that didn't involve making money for Veolia?

23 A. Sometimes to do the right thing for
24 a community and to help people.

1 Q. So it's your testimony that
2 sometimes Veolia would have the goal of doing the
3 right thing for the community to help people; is
4 that right?

5 A. And for the industry.

6 Q. And for the industry.

7 What are you referring to by "the
8 industry"?

9 A. The water industry, the water and
10 wastewater industry.

11 Q. Okay.

12 A. The environment, those sort of
13 things.

14 Q. And can you give any examples of
15 times when Veolia had the goal of doing the right
16 thing for the community to help the people?

17 A. Yeah, Flint.

18 Q. Flint.

19 So Flint was not about making money
20 for Veolia; is that right?

21 A. It's a \$40,000 project, ma'am.

22 Q. You would have considered that a
23 small project for Veolia; right?

24 A. I don't know about a small project,

1 but there wasn't -- there was not enough revenue
2 there and the man-hours that needed in order for
3 you to say that this was going to be a money
4 project. It's \$40,000.

5 Q. Did Veolia -- during the time that
6 you were in charge of business development, did
7 Veolia regularly take on projects that were only
8 \$40,000?

9 A. No.

10 Q. So based on the projects that you
11 oversaw during your time in business development,
12 the Flint project would have been a small project;
13 right?

14 A. I don't know about small, but it
15 would have been a project that we would have
16 looked at carefully to make sure that it was the
17 right project for the organization and for that
18 community and can we help them.

19 Q. Okay. So it's your testimony today
20 that Veolia agreed to take the Flint project in
21 order to help the people of Flint?

22 A. Without a doubt.

23 Q. Okay. No other reason?

24 A. I can't speak for other people.